

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

_____	)	
PATRA, LLC., and	)	
ILIAS GIANNAKOPOULOS,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Action No. 05-11471
	)	
MOTIVA ENTERPRISES, LLC,	)	
and STEVE L. SANTORO	)	
	)	
Defendants.	)	
_____	)	

**DEFENDANT MOTIVA ENTERPRISES, LLC'S CERTIFICATION  
REGARDING BUDGETING AND ALTERNATIVE DISPUTE RESOLUTION**

Pursuant to Local Rule 16.1(d)(3), counsel for the defendant, Motiva Enterprises, LLC, hereby certifies that she has conferred with her client to discuss:

- (1) the budget for the costs of conducting the full course -- and various alternative courses--of the litigation; and
- (2) the resolution of the litigation through the use of alternative dispute resolution programs such as conciliation, mediation and arbitration.

**MOTIVA ENTERPRISES, LLC.**  
By Its Attorneys,

/s/ Amy Cashore Mariani  
William L. Parker, BBO# 549839  
Amy Cashore Mariani, BBO # 630160  
Anne-Marie Gerber, BBO# 649337  
**FITZHUGH, PARKER, & ALVARO, LLP**  
155 Federal Street, Suite 1700  
Boston, MA 02110-1727  
(617) 695-2330

**CERTIFICATE OF SERVICE**

I hereby certify that on this 16<sup>th</sup> day of September, 2005, I served a copy of the above document on all counsel of record as follows.

Erik J. Frick, Esq.  
Eckert Seamans Cherin & Mellott, LLC  
One International Place, 18th Floor  
Boston, MA 02110

/s/ Melissa Wangenheim  
Melissa Wangenheim